

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-12346 MLW

MARLOW WILLIAMS, SR.,  
Plaintiff.

v.

GRANT CALLENDAR, OTIS  
HAREWOOD, GREG LONG,  
BRIAN ALBERT, EDWARD  
MEADE, JOHN CONROY, AND  
THE CITY OF BOSTON,  
Defendants.

**DEFENDANTS' PROPOSED JOINT STATEMENT**

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for Boston Police Officers Grant Callender, Otis Harewood, Greg Long, Brian Albert, Edward Meade, John Conroy ("the officers") and the City of Boston ("the City") (collectively "the defendants") propose the following pretrial schedule:

1. Defendants' Proposed Joint Discovery Plan and Motion Schedule<sup>1</sup>:

The Defendants propose the following pre-trial schedule:

- (a) Automatic document disclosures will be completed on or before October 10, 2005;

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<sup>1</sup> The Defendants have been unable to confer with the Plaintiff, Marlow Williams, because of his present incarceration.

- (b) Written discovery requests are to be served by February 10, 2006 and answers/responses are to be served within the time provided by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts;
  - (c) All depositions are to be completed by June 30, 2006, except for expert witness;
  - (d) The plaintiffs' expert witnesses shall be designated by July 1, 2006, and defendants' expert witnesses shall be designated within 30 days after plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26(b)(4)(A); designation of experts shall include provision of any information required by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts; any expert depositions shall be completed within 30 days of defendants' expert designation;
  - (e) All dispositive motions are to be filed by July 31, 2006, and responses are to be filed fourteen days thereafter pursuant to Local Rule 7.1;
  - (f) The plaintiff shall name other parties, if any, not later than June 15, 2006;
  - (g) A final pre-trial conference will be held per order of the Court.
2. Defendants intend to take no more than 10 depositions during the discovery period, in conformity with Fed. R. Civ. P. 30(a)(2)(A) and LR, D. Mass. 26.1(C).
3. Certifications regarding each parties' consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

Respectfully submitted,  
DEFENDANTS, GRANT CALLENDAR,  
OTIS HAREWOOD, GREG LONG, BRIAN  
ALBERT, EDWARD MEADE, JOHN  
CONROY, AND CITY OF BOSTON  
Merita A. Hopkins  
Corporation Counsel  
By its attorneys:

/s/ Helen G. Litsas  
Helen G. Litsas, BBO #644848  
Thomas R. Donohue BBO #643483  
Assistant Corporation Counsel  
City of Boston Law Department  
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Boston, MA 02201  
(617) 635-4023 - Litsas  
(617) 635-4039 - Donohue

**CERTIFICATE OF SERVICE**

I, Helen G. Litsas, hereby certify that on this date I served a copy of the foregoing documents upon: the pro se plaintiff, Marlow Williams, Sr., Booking No. 0303857, Suffolk County House of Correction, 20 Bradston Street, Boston, MA 02118, by postage prepaid, first class, U.S. Mail.

9/26/05  
**Date**

/s/ Helen G. Litsas  
**Helen G. Litsas**